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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

GRACE QUINN,

Plaintiff,

v.

NAVIENT

Defendant.

Case No. 2:18-cv-01792-RFB-GWF

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR NAVIENT
TO FILE AN ANSWER OR OTHERWISE
RESPOND TO PLAINTIFF’S
COMPLAINT**

(FIRST REQUEST)

Plaintiff GRACE QUINN (“Plaintiff”) and Defendant NAVIENT SOLUTIONS, LLC, incorrectly named NAVIENT in the Complaint, by and through their respective counsel, stipulate and agree to extend the deadline from September 11, 2018 to September 29, 2018, for Defendant NAVIENT SOLUTIONS, LLC. (“NSL”), to File an Answer or Otherwise Respond to Plaintiff’s Complaint (ECF No. 1.).

On September 17, 2018, Plaintiff filed his Complaint. The claims at issue necessitate additional time for fact-finding. Further, NSL is in the process of acquiring and reviewing all relevant documents so that it can meaningfully respond to the specific allegations contained in Plaintiff’s Complaint. Moreover, undersigned counsel was just retained by NSL to defend it in this action, and therefore requires additional time to investigate the allegations and claims asserted against NSL. Plaintiff has no opposition to NSL’s request for an extension until September 29, 2018 to file an answer or otherwise respond to Plaintiff’s Complaint.

1 This is the first stipulation for extension of time for NSL to respond to Plaintiff's Complaint
2 and is being made in good faith and not for purposes of undue delay. No additional requests for
3 extensions are contemplated.

4 **IT IS SO STIPULATED.**

5 Dated this 10th day of October 2018.

6 **HOLLEY, DRIGGS, WALCH, FINE,**
7 **WRAY, PUZEY & THOMPSON**

8 /s/ Michael R. Ayers
9 JAMES W. PUZEY, ESQ.
10 MICHAEL R. AYERS, ESQ.
11 JOHN SAVAGE, ESQ.
800 S. Meadows Parkway, Suite 800
Reno, Nevada 89521
Attorneys for Defendant NAVIENT SOLUTIONS, LLC

12 Dated this 10th day of October 2018.

13 **HAINES & KRIEGER, LLC**

14 /s/ David H. Krieger
15 DAVID H. KRIEGER, ESQ.
16 8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
Attorneys for Plaintiff

17
18 **ORDER**

19 The Stipulation for Extending Deadline for NSL to file an answer or otherwise respond up
20 to and including October 29, 2018 is so ORDERED AND ADJUDGED.

21 Dated this 11th day of October, 2018.

22 
23 UNITED STATES MAGISTRATE JUDGE